

Exhibit 6

CONTINUATION OF CRIMINAL COMPLAINT

I. INTRODUCTION

1. I, Timothy Kruithoff, have been employed as a Special Agent with the Department of Homeland Security Investigations (HSI) since August 2002. Prior to becoming a Special Agent, I was employed as U.S. Customs Inspector. As part of my duties as an HSI Special Agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the sexual exploitation of children (i.e. production of child pornography), in violation of 18 U.S.C. § 2251(a) and violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2252A(a). I have received training in the area of child pornography and child exploitation, and I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256(8)) in many forms of media, including computer media.

2. The statements in this Continuation of Application for a Criminal Complaint and Arrest Warrant are based in part on information from Queensland Police Service (QPS) Child Abuse & Sexual Crime Group Task Force ARGOS, witnesses, my personal knowledge and my experience and training as an HSI Special Agent. This Continuation of Application for a Criminal Complaint and Arrest Warrant is intended to merely show there is probable cause for the requested warrant and does not set forth each and every fact known to me concerning this investigation.

3. The information in this Continuation establishes probable cause that WESTLEY JAMES KEYES produced child pornography in violation of 18 U.S.C. § 2251(a).

III. FACTS SUPPORTING PROBABLE CAUSE

4. In September of 2021 Homeland Security Investigations (HSI) Grand Rapids received information from the HSI Cyber Crime Center (C3) Child Exploitation Investigations Unit (CEIU) Victim Identification Program/Lab team in regards to a lead from the Queensland Police Service (QPS) Child Abuse & Sexual Crime Group Task Force ARGOS, consisting of current and former Law Enforcement personnel, regarding forty two (42) child abuse images and fourteen (14) non-abuse images first shared by the Tor user/profile 'hotlips666' on a dark web child exploitation chat site/forum from May of 2020.

5. Queensland Police Service is actively investigating darknet boards that are known to be dedicated to the proliferation of child exploitation material. During its investigation, Queensland Police Service saw imagery posted by “Hotlips666” and sought to identify the location depicted in the imagery.

- a. During Queensland Police Service's review of the non-abuse image, 89565549948.jpg, which depicts a pre-pubescent female wearing a bathing suit and standing on an informational panel next to a river/creek,

Queensland Police Service ARGOS identified the outside location as the Historic Bridge Park in Battle Creek, Michigan.

- b. During Queensland Police Service ARGOS review of another non-abuse image, 565808938.jpg, which depicts the same child in a different location in a park setting. She is wearing a different bathing suit while laying on a picnic bench. Queensland Police Service ARGOS identified the outside location as the Ross Township Park, Hickory Corners, MI 49060.
- c. During Queensland Police Service ARGOS review of another non-abuse image, 565965000.jpg, which depicts the same child in residential area, Queensland Police Service ARGOS identified the outside location as being in front of the address 109 Hwy St, Battle Creek, Michigan. These locations were identified by Queensland Police Service ARGOS using manual man hours surfing open-source images and street-views of locations.

6. In addition to Queensland Police Service ARGOS identification of several of these images posted being taken in the Battle Creek, Michigan area, several other images posted by “Hotlips666” and provided to HSI Grand Rapids, were found to have had EXIF data embedded within the images.

- a. EXIF stands for Exchangeable Image File Format and refers to the basic metadata that is generated and stored by a camera when taking an image.
- b. EXIF data may include identification of the device used to capture the image, the date and time the image was captured, as well as the GPS location.
- c. This EXIF data, in some of the abuse and non-abuse images provided to HIS Grand Rapids show the images were taken with a Samsung phone, model #SM-G973U1 in June and August 2020.
- d. There are two minors depicted separately in multiple images with EXIF data: a female teenager and a female aged approximately 2-4 years.

7. Law enforcement identified a female teenager (Minor 1) depicted in several of the non-abuse images with EXIF data.

8. On January 10, 2022, Minor 1 was forensically interviewed by Homeland Security Interview Specialist Amy Allen. Minor 1 identified the location depicted in all four photographs as her grandparents’ home where KEYES resides. Minor 1 explained that only KEYES and one other person, MM, were in her immediate vicinity at the time one of the four photographs were taken.

9. Following the forensic interview, I spoke with Minor 1’s mother. Minor 1’s mother stated that she is aware that KEYES had previously been convicted of a crime involving

child pornography. Minor 1's mother stated that her brother JM shared concerns with her regarding his observation of KEYES taking photographs of children at times which did not seem appropriate such as during a diaper change. Minor 1's mother stated her brother JM is married to KM and they have a female child whom she believes is currently 5 or 6 years of age. Minor 1's mother stated that KEYES currently resides at "SUBJECT PREMISES" with KEYES' grandparents, JK and RK.

10. On January 10, 2022, investigators went to JM and KM's home. KM was home at the time and agreed to speak with investigators. Investigators showed KM sanitized versions of abuse images depicting Minor 2 first shared by the Tor user/profile 'hotlips666' on a dark web child exploitation chat site/forum. KM confirmed that Minor 2 is her daughter. KM produced to investigators a pair of underpants depicted in one of the images. KM stated she is aware that KEYES has had a Samsung phone in the past because she previously considered purchasing it from KEYES.

11. In the abuse images of Minor 2, adult male fingers are shown, pulling down the minor's underwear and exposing the genitalia area.

12. Homeland Security Interview Specialist Amy Allen conducted a forensic interview of Minor 2. During the interview Minor 2 reported that KEYES took photographs of her genitalia.

13. Due to safety concerns for KEYES and to prevent the destruction of evidence, following KM's positive identification of Minor 2 on January 10, 2022, HSI Grand Rapids Special Agents went to the SUBJECT PREMISES to secure it and encountered KEYES, JK and RK.

14. After securing the residence and later learning Minor 2 disclosed that KEYES pulled her underwear down and took pictures of her genitalia, KEYES was arrested on probable cause by HSI Special Agent Tim Kruithoff. KEYES was read his Miranda Warning and he consented to HSI Special Agents searching his bedroom.

15. During the search of KEYES' bedroom, investigators discovered the following electronic devices: Samsung Galaxy phone, model #SM-G973U1, IMEI #352338107385419; Toshiba Satellite laptop, S/N #9B276675K; Acer laptop Model #5315, S/N #81506623316; HP laptop Model #G60642NR, S/N#2CE01914SK; Omen laptop, Model #15-EN1013DX, S/N#5CD1238S46; Samsung portable SSD external hard drive, S/N #S5TFNJ0R103421A (collectively SUBJECT DEVICES). KEYES refused to provide his fingerprint or other passwords in order to access the SUBJECT DEVICES.

16. A review of KEYES' criminal history revealed a 2016 conviction for Child Sexually Abusive Activity – Distributing or Promoting.

17. Samsung is a South Korean corporation and Samsung-brand cellular telephones are not manufactured in the state of Michigan.

18. Based upon my knowledge, experience, and training in child exploitation and child pornography investigations, and the training and experience of other law enforcement officers with whom I have had discussions, there are certain characteristics common to individuals involved in the distribution, receipt, and collection of child pornography. Individuals who possess, transport, receive, and/or distribute child pornography often seek out like-minded individuals, either in person or on the Internet, to share information and trade depictions of child pornography and child erotica. Such correspondence may take place, for example, through online bulletin boards and forums, Internet-based chat messaging, email, text message, video streaming, letters, telephone, and in person.

19. In this case, communications as described above took place in different dark web boards. Queensland Police Service provided HSI Grand Rapids with chat messages it obtained from different dark web boards posted by the user profile of "Hotlips666." Those messages include the following:

2020-04-04T20:25:58.100Z	i love them to be g 38 the for me
2020-04-04T20:26:24.100Z	3-8
2020-04-04T20:27:07.100Z	my bad all lmao
2020-04-22T13:06:52.000Z	Hi Im into girls 3-8 I am a single father and will do my best share what I have and I like to participate in chat rooms
2020-04-23T08:13:00.100Z	little girls are sooo hot
2020-04-23T08:21:00.100Z	I haven't been able to find any good hurtcore lately
2020-05-14T08:21:46.000Z	Is there anybody on here in to kill and little girls you so please PM me
2020-05-14T08:36:00.100Z	Lookin for somebody and to killing little girls please PM
2020-05-15T11:20:00.098Z	Man I love some good pussy
2020-05-15T12:14:56.000Z	Look I don't like asking but I just got out of president lost all my collection does anybody have links to neurology ty
2020-05-15T12:16:14.000Z	Prison
2020-05-15T13:10:46.000Z	love dead pussy all day
2020-05-15T13:50:00.100Z	I get to see my 3 yr niece today first time
2020-05-15T13:51:00.100Z	And my brother is going to let me have her overnight so I'm so excited right now
2020-05-15T13:53:00.096Z	I will be putting pic up later tonight
2020-05-15T13:56:00.092Z	She going to be a good CP star soon

2020-05-17T11:00:54.100Z	yes a lot of nice people on here and that's why I jut pictures of my daughter's on here
2020-05-17T11:11:29.100Z	I would seriously like it if somebody would kidnap her and one day find pictures of her on here so
2020-05-17T11:18:00.100Z	A few days ago a guy was showing me pictures of dead little girls and I can't stop thinking about them
2020-06-05T17:18:00.100Z	I love just think about what happens to these little girls that get kidnapped
2020-06-05T17:19:00.099Z	Most jelly time it doesn't in well and I know at least half of the pictures I can find are at least kidnapped kids so hot
2020-06-13T13:40:58.000Z	I would love to watch somebody snuff my daughter in front of me
2020-06-13T13:44:45.000Z	she's 7
2020-06-17T14:23:00.100Z	I would love to watch what would happen if I left my 8 year old daughter in a Room with all of you
2020-06-17T14:28:00.097Z	So hot
2020-06-17T14:36:00.100Z	I let her sleep out side in hopes someone will kidnap her
2020-06-17T14:42:00.097Z	I hop you all like please pass her around
2020-06-17T14:43:00.100Z	I promise if I see her passed around on here I will put more of her on here maybe even take request
2020-06-17T14:43:00.100Z	Trying to make her in to a CP star
2020-06-17T14:45:00.097Z	I'd love for all of you to give her some pedo dick
2020-06-17T14:46:00.098Z	I'm just trying to pay it forward
2020-06-17T14:47:00.098Z	No I'm not in to fucking my kid but I'll let others at her
2020-06-17T14:47:00.100Z	I'd love it if you rape her
2020-06-17T14:48:00.099Z	6
2020-07-06T12:40:59.000Z	I'd love to have my niece to fuck a pig

2020-12-07T10:02:00.100Z	God i love being a pedo
2020-12-07T10:04:00.097Z	To all LEA on here tonight I kidnapped my first sex toy
2020-12-07T10:04:00.098Z	I will post the pictures soon she was a good fuck
2020-12-07T10:08:00.100Z	most LEA love looking at CP and get paid for it
2020-12-07T10:09:00.100Z	is BS
2020-12-07T10:09:00.100Z	look on here they post pictures of kids get fuck and that
2020-12-07T10:14:00.099Z	she was 7
2020-12-07T11:03:00.100Z	does any one have necro or snuff link if so ty

20. I reviewed the chat logs and identified the image (1eemq4jhe.jpg) that was sent on 08-02-2020, as a non-abuse image with EXIF data depicting Minor 1. The EXIF data in “1eemq4jhe.jpg” matches EXIF data in the abuse and non-abuse images depicting Minor 2. The following are the chat messages:

2020-08-02T05:21:56.100Z	my lovers
2020-08-02T05:26:46.100Z	g. http://oju4yn237c6hjh42qothvpreqecnjhtvh4sgn3fqmsdvhu5d5tyspid.onion/i/1eemq4jhe.jpg

IV. CONCLUSION

21. Based upon the facts set forth above, I respectfully submit there is probable cause to believe that WESTLEY JAMES KEYES committed a violation of 18 U.S.C. § 2251(a).